

STIP

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KATHRYN MAYORGA, an individual)

2:19-cv-00168-JAD-DJA

Plaintiff,)

vs.)

CRISTIANO RONALDO, individually,)

Does I-XX and Roe Corporations I-XX;)

Defendants.)

STIPULATION TO STAY ALL DISCOVERY PENDING

THE COURT'S DECISION ON VARIOUS MOTIONS

(First Request)

IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN plaintiff

KATHRYN MAYORGA by and through her attorney LESLIE MARK STOVALL, ESQ. and

defendant, CRISTIANO RONALDO, by and through his attorney PETER S. CHRISTIANSEN,

ESQ., that the parties will stay this action and the process of discovery pending resolution of the

defendant's motion for case terminating sanctions and/or to disqualify [ECF 111 and 112],

defendant's motion for leave to (i) file under seal exhibits D, P and W to defendant's emergency

1 motion for case terminating sanctions [ECF 113] and plaintiff's motion for in camera review of
2 the football leaks documents to determine whether the crime/fraud exception applies [ECF 124].
3 Further, the parties agree to submit a revised discovery plan and proposed scheduling order
4 within 30 days after entry of a decision on the various Motions identified above in the event this
5 matter is not resolved.
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7 The parties have stipulated to stay discovery for the following reasons: Pending before
8 the court are defendant's motion for case terminating sanctions or disqualification of plaintiff's
9 counsel [ECF 111 and 112], defendant's motion for leave to file under seal exhibits D, P and W
10 to defendant's motion emergency motion for case terminating sanctions [ECF 113] and
11 plaintiff's motion for in camera review of the Football Leaks documents to determine whether
12 the crime/fraud exception applies [ECF 124]. The court responded to the filing of defendant's
13 emergency motion for case terminating sanctions and to disqualify Stovall and Associates by
14 determining that expedited consideration was unnecessary, ordering that response and reply
15 briefs be due in the ordinary course, that depositions scheduled on June 23, 24, 25 and 28 not go
16 forward on the schedule dates and be stayed until the court rules on the pending motions and
17 finally ordering that expert deadline is stayed pending ruling on the instant of motion [ECF 114].
18 The parties stipulated to extend time for the filing of replies and oppositions to August 18, 2021
19 and September 1, 2021 which this court reduced to order on July 28, 2021 [ECF 128].
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23 Under the current scheduling order, the close of discovery is set for October 31, 2021.
24 Because the court's decision on the pending motions could potentially be case terminating, and
25 at a minimum, likely to impact which documents may be used during the remaining depositions,
26 the parties believe it to be in the best interest of both sides to stay discovery. If the parties
27 proceed with depositions absent such rulings, their questioning will be significantly limited and
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1 certain witnesses would likely need to be recalled, thereby duplicating time and resources.
2 Additionally, if the court enters case terminating sanctions, all further discovery would be for
3 naught. For these reasons that parties have stipulated to stay discovery pending the court's
4 decisions on the subject motions and request that the court approve their stipulation and order a
5 stay of discovery as requested.
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7 Dated this 29, July, 2021
8 STOVALL AND ASSOCIATES
9 /s/ *Leslie Mark Stovall*

10 LESLIE MARK STOVALL, ESQ.
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Dated this 29, July, 2021
CHRISTIANSEN TRIAL LAWYERS
/s/ *Kendelea Work*

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KENDELEE LEASCHER WORKS, ESQ.
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17 **ORDER**

18 **IT HEREBY ORDERED** that any further discovery should be stayed pending resolution
19 of the defendant's motion for case terminating sanctions and/or to disqualify [ECF 111 and 112],
20 defendant's motion for leave to (i) file under seal exhibits D, P and W to defendant's emergency
21 motion for case terminating sanctions [ECF 113] and plaintiff's motion for in camera review of
22 the football leaks documents to determine whether the crime/fraud exception applies [ECF 124].

23 **IT IS FURTHER ORDERED** that the parties shall submit a discovery plan and
24 proposed scheduling order within 30 days after entry of a decision on the defendant's motion for
25 case sanction terminations and/or to disqualify [ECF 111 and 112], defendant's motion for leave
26 to (i) file under seal exhibits D, P and W to defendant's emergency motion for case terminating
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1 sanctions [ECF 113] and plaintiff's motion for in camera review of the football leaks documents
2 to determine whether the crime/fraud exception applies [ECF 124].

3 DATED this ____ day of July, 2021
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5 THE HONORABLE DANIEL J. ALBREGTS
6 UNITED STATES MAGISTRATE JUDGE
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